

# **EXHIBIT V**

# Multilingual CONNECTIONS

## Certificate of Accuracy

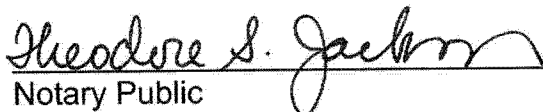
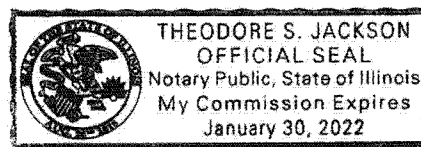
I certify that **Noe Baltazar Noe's Declaration** was translated into **English** by translators and editors working for Multilingual Connections who are competent and qualified to perform translation into these languages. These documents have not been translated for a family member, friend, or business associate. I believe, to the best of my knowledge and abilities, that the attached materials are accurate and complete translations of the original **Spanish** version.



**Nicholas Ferri**

Multilingual Connections, LLC

Subscribed and sworn to before me this **12th** day of **June, 2019**, in Evanston, Cook County, State of Illinois.

  
Notary Public

Multilingual Connections, LLC #255450  
PM: Nicholas - 283

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION No.  
3:17-cv-05806-RJB

DECLARATION OF  
NOE BALTAZAR NOE

I, Noe Baltazar Noe, declare the following:

- 1- I am over eighteen years of age, have personal knowledge of and am competent to testify regarding the matters contained herein.
- 2- I have been detained in the Northwest Detention Center (NWDC) since February 2018.
- 3- I have been working in the Voluntary Work Program (VWP) for over one year. I want to be busy while being detained, and earn some money to be able to call my family and purchase food from the commissary, which is very expensive. I have held three jobs so far, all of them as a cleaner but in different areas of the NWDC.

DECLARATION OF NOE BALTAZAR NOE

1

OFFICE OF THE ATTORNEY GENERAL OF  
WASHINGTON  
Civil Rights Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104-3188  
(206) 464-7744

WA00029704

- 4- To apply for a job with the VWP, I signed up on one of the tablets that are located in my housing unit. When there was a job opening, one of the GEO officers let me know that I was hired and when I would start.
- 5- First, I worked as a cleaner assigned to cleaning the secured area's hallways. I began work every day at 7:30 a.m. GEO paid me \$1 a day.
- 6- I worked in this position only for about 15 days. At that time of day it was usually cold inside the NWDC. Since it was so cold and it only paid \$1 a day, I decided to quit the job with the hope of getting another job with a better schedule.
- 7- I applied again and was assigned to clean the intake area, which was not as cold. The work consisted of cleaning the entire intake area and the restrooms located in that area, mopping and sweeping, taking out the garbage and placing new garbage bags in the garbage bins. I also had to clean windows and doors. Some of the windows are very large and cleaning them takes a long time. On average, I worked for two and a half hours per day, seven days per week. Since the work was harder than I expected, especially being paid only \$1 a day, I decided to quit and apply for another position.
- 8- I applied for another job and was assigned to work as a cleaner in the visitation area. I have been doing this work for about ten months. I work seven days a week and they pay me \$1 a day.
- 9- As a cleaner in the visitation area, my job requires me to clean the entire visitation area, mop the floors, take out the garbage, clean the windows and tables, both in the visitation rooms as well as in the courtrooms located within the NWDC. There are approximately fifteen rooms in the family visitation area, five rooms in the attorney visitation area, five

1 courtrooms and two bathrooms located in the visitation area. I clean all of  
2 them every day.

3 10- When I started the job, I received training from the GEO security officers  
4 assigned to the visitation area. They trained me for the first couple of  
5 days, showed me how to do the job, what I had to do and where to clean.  
6 They supervise my work every day, provide me with the tools, supplies  
7 and equipment I need to do the job such as spray cleaning products, paper  
8 towels and garbage bags.

9 11- When I started this job and for about three months, I was the only  
10 detainee-worker hired to do the work. During this time, it took me around  
11 three and a half hours to finish the work every day. The GEO officers  
12 who supervised my work noticed that, although I was doing my work  
13 correctly, it took me over three hours each day to finish cleaning the area  
14 assigned. They told me that because of this, they decided to hire two more  
15 detainees so that they would work with me cleaning the visitation area.  
16 One of them has been deported, so now there are two of us detainee-  
17 workers assigned to clean the area, and it takes us approximately an hour  
18 and a half every day to finish the job.

19 12- In general, we begin work at 7 pm and finish when all of the cleaning is  
20 done.

21 13- The job of cleaning the visitation area also requires me to buff and wax  
22 the floors of the area. This happens approximately once every three  
23 months. The GEO security officers tell me when it is time to buff and  
24 wax, and they provide me with a buffing machine and the waxing  
25 products necessary for doing this job. On these days, I begin working  
26 earlier than usual, around 5 pm, because this work requires more hours to

complete. Even though buffing and waxing requires us to work much longer than usual, between three and a half and four hours, they only pay us \$1 a day for doing the work.

14- The other jobs available at the NWDC are in the kitchen or at the laundry. I did not want to work at either of these jobs because they also pay only \$1 a day, but they require you to work around 5 hours or more each day. I believe that in the laundry, detainee-workers have to lift heavy bags and do the laundry of all of the detainees at the NWDC, which is hard work. In the kitchen, the detainees help cook, clean and plate food for the whole population of the NWDC. I am not willing to do such hard work for just \$1 a day.

15- I believe the work I do is fundamental to keep the NWDC clean and operating properly, and I deserve to be paid more than \$1 a day for the work that I do.

I certify under penalty of perjury under the laws of the United States and the State of Washington that the above is true and correct.

Dated this 21<sup>st</sup> day of May 2019 in Tacoma, Washington.

[Signature]

NOE BALTAZAR NOE